



## Privacy Notice

This privacy notice tells you what we do with your personal information when you contact us or use one of our services. It applies to everyone who uses our services. Personal information is any information that can be linked to a living person.

### Who are we?

Queens Road Medical Practice provides a range of medical services and as such, we use information about our patients to provide them with the best possible health care. Queens Road Medical Practice are responsible for keeping the personal information we use safe and we take the privacy and rights of our patients very seriously. The policy detailed below outlines how we use data received from Patients and other members of the public and provides contact details should you require any further information.

### What information do we collect?

We collect personal information in order to provide you with medical services. The information we collect will include:

- Names
- Contact details such as telephone number, email address, postal address
- Account information

We may also collect electronic information, such as:

- Your online identifier
- Your Internet Protocol (IP) address
- Tracking data such as your browsing choices on our website using internet cookies
- Hardware and software used
- General location data

Most of the data we hold is about health and medical conditions and this is considered 'special category data'. This data is generally collected from the individual themselves, or other healthcare professionals. Under Data Protection Law, this 'special category data' is any personal information about someone's:

- Health (including mental health)
- Sex life
- Sexual orientation
- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership

### How do we use this information?

Primarily we collect and use this data to provide the best possible medical care and to help us improve our services and the patient experience. This is in accordance with local law, which allows for the processing of data "for health and social care purposes undertaken by a health professional."

We use your information to:

- Verify your identity
- Improve our services and your patient experience
- Comply with regulation

We may also use your data to:

- Investigate or respond to legal enquiries
- Contact you if there are any changes to the policy
- Ensure we comply with legal requirements

Finally, data may be used for 'legitimate interests of our business'. For example, to see that the Practice runs efficiently, plans for future services, trains its staff and receives monies due. Information may also be needed to help educate tomorrow's clinical staff and to carry out medical and other health research for the benefit of everyone.

We only share data according to the conditions set out in Law. This is primarily for direct medical care purposes, for example, with Sarnia Medical Services Ltd (the local primary care out of hours service), specialists, Island agreed screening programmes, Social Services and Employment and Social Security. We also share data for Public Health purposes. In exceptional circumstances, if there is an overriding public interest, for example people's lives are at risk, we may share information with Police. These exceptions are:

- exceptional cases permitted by law where we are legally compelled to do so
- where there is a duty to the public to disclose
- where disclosure is required to protect the vital interests of a patient
- where disclosure is made at your request or with your consent

There are circumstances where we believe use of third-party processors would be beneficial to enabling us to provide you with the best service, but this would not be considered 'essential'. In these circumstances we will seek explicit consent from you before using your data in this way, and you are entitled to say you would prefer us not to at any point. One example of this is a piece of software called 'Heidi AI', which transcribes conversations between you and our doctor during your consultation. This enables excellent contemporaneous efficient note keeping, allowing the doctor to spend more time focusing on what matters most - the patients themselves - without slowing down the consultations. Should you have any questions about this, please do not hesitate to get in touch with us.

### **Use of Email:**

We appreciate many people like to use email as a means of communication these days and we would like to accommodate this.

Under The Data Protection (Bailiwick of Guernsey) Law 2017 we are required to apply appropriate technical and organisational measures to ensure the security of our patients' (data subjects) data.

However, it is important that you understand that we cannot guarantee the secure transmission of emails to personal email accounts.

Some email service providers provide a level of encryption, to reduce the risk that emails could be intercepted (hacked). Please check with your service provider exactly what cover they provide. Please also bear in mind that personal email accounts are at risk of being hacked once emails have been received.

Queens Road Medical Practice sends emails using forced Transport Layer Security (TLS), and therefore any email address which also has TLS will be automatically encrypted in this way.

If we are unaware of the TLS status, we ensure any emails containing personal identifiable information are password protected.

Please note, due to the risks mentioned above, Queens Road Medical Practice will never initiate the use of email to communicate details about your medical care (Special Category Data). Should you wish to use email for this purpose, it will be at your own risk.

If you provide us with an email address it will be used for providing information considered relevant to your health. This may include:

- Information regarding services we think would be of interest / benefit to your health
- Practice development initiatives, e.g. health improvement surveys, patient feedback, Practice newsletter

You can request we do not use your email address for any of the above purposes at any time by emailing/ calling / unsubscribing at any time.

### **Does your information go elsewhere?**

To function efficiently we use other companies ('data processors') to fulfil certain obligations. For example, we outsource the secure destruction of data no longer required to another company. In all instances, these 'data processors' are vetted to ensure they also comply with the current regulations.

The Practice Policy for retaining data is in line with NHS UK guidance - the length of time records are kept for depends on the details within the medical history.

For any circumstances we may think it beneficial to process your data in a way that is not covered by another lawful basis, we will ensure we seek your explicit consent.

**Access to your information:**

If you would like to request a copy of the information that we hold about you, please use the contact details below. To ensure your personal information is up to date, please inform us of any changes you think we should be aware of.

**Changes to our privacy policy:**

We keep our privacy policy under regular review and we will place any updates on our website. This privacy policy was last updated on 6<sup>th</sup> February 2025

**How to contact us:**

If you have any questions about our privacy policy, please use: email: [admin@egrmp.com](mailto:admin@egrmp.com) or phone: 01481 724184. Our Data Protection Officer is Dr Charis Cassells.

**Supervisory Authority:**

Should you have an issue regarding data protection that you do not feel able to raise with us directly, you are entitled to contact The Office of the Data Protection Authority on 01481 742074.

**How we protect your information:**

We work hard to keep your data safe. We use an appropriate combination of technical and organisational measures to ensure, as far as reasonably possible, the confidentiality, integrity and availability of your information at all times. If you have any security-related concerns, please contact us using the details provided in this notice.

We advise all our website users to always close the browser they have used after accessing our site to ensure other users cannot obtain access to their data. We capture your electronic information over a secure link using recognised industry standard Secure Sockets Layer (SSL) technology which encrypts the data whilst passing it over the web. This will be indicated on most browsers by a lock in the status bar at the bottom of the screen. Firewalls are used to block unauthorised traffic to the servers and the actual servers are locked in a secure location which can only be accessed by authorised personnel.

Where possible, we anonymise tracking data of website interaction. This data is used so we can improve the website experience and so we can monitor the efficacy of the website service.

Our website and payment system are managed by external persons with their own Privacy Notices and these can be seen by visiting their websites and following the links below:

- <https://www.sagepay.co.uk/policies/privacy-policy>
- <https://www.romancart.com/sell-more/action/privacy.htm>

**Your Rights**

You have several rights with regards to the personal information that we hold about you. The rights are as follows:

**Right of access:**

You have the right to ask us for copies of your personal information. This right always applies. There are some exemptions, which mean you may not always receive all the information we have about you.

**Right to rectification:**

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies. It is important that we have a correct copy of the information available to doctors at the time they are treating you.

**Your right to erasure:**

You have the right to ask us to erase your personal information in certain circumstances. You can find out more about this from The Office for the Data Protection Commissioner. We will not normally delete information from medical records. This is because it is important that we have a copy of the information available to doctors at the time they are treating you.

**Your right to restriction of processing:**

You have the right to ask us to restrict the processing of your information in certain circumstances.

**Your right to object to processing:**

You have the right to object to the processing of your data in some circumstances. These include when data is processed for direct marketing, legitimate business interests or by a public body, or when data is processed for historical or scientific purposes.

Your right to data portability:

This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another, or give it to you. The right only applies if we are processing information based on your consent or under a contract (or in conjunction with a potential contract) and the processing is automated.

Your right to withdraw consent:

You have the right to choose if your personal information is used to provide you with marketing information. This is explained in the email section of this notice.

You are not required to pay any charge for exercising your rights.